

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

AMANDA FLANNERY,

Plaintiff,

- against -

THE CITY OF ROCHESTER, a municipal entity,
PAUL ROMANO, "JOHN DOE POLICE
OFFICERS 1-200" (names and number of whom are
unknown at present), COUNTY OF MONROE,
TODD BAXTER, "RICHARD ROE SHERIFF'S
DEPUTIES 1-200" (names and number of whom are
unknown at present), and other unidentified members
of the Rochester Police Department and Monroe
County Sheriff's Office,

Defendants.

**NOTICE OF MOTION TO
PARTIALLY DISMISS THE
AMENDED COMPLAINT**

Case no: 22-cv-6101

Defendants City of Rochester ("City") and Paul Romano (collectively "City Defendants")
move this Court pursuant to FED. R. CIV. P. 12(b)(6) to dismiss the first, third, fourth, seventh, eighth,
eleventh, twelfth, and thirteenth claims in the Amended Complaint of the above-entitled action for
failure to state a claim for relief.

In support of this motion the Court is referred to the Declaration of Peachie L. Jones, Esq.,
with exhibit attached, and the Memorandum of Law, all submitted herewith and made part of this
motion. City Defendants reserve the right to file a reply memorandum of law within fourteen days of
Plaintiff's filing any opposition to this motion.

Date: March 3, 2022
Rochester, NY

LINDA KINGSLEY
CORPORATION COUNSEL

By: 

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